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PUBLIC ENTITIES COMMITTEE  
8

9 **UNITED STATES BANKRUPTCY COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**  
11

12 In re  
13 PG&E Corporation

14 -and-

15 PACIFIC GAS AND ELECTRIC  
16 COMPANY,

17 Debtors.

Bankruptcy Case  
Case No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**SECOND AMENDED VERIFIED  
STATEMENT OF THE AD HOC  
CALIFORNIA PUBLIC ENTITIES  
COMMITTEE PURSUANT TO  
BANKRUPTCY RULE 2019**

- 18 ☐ Affects PG&E Corporation  
19 ☐ Affects Pacific Gas and Electric Company  
20 ☒ Affects Both

21 *\*All papers shall be filed in the Lead Case,*  
22 *19-30088 (DM)*  
23

24 Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy  
25 Rules”) the Ad Hoc California Public Entities Committee (the “Ad Hoc Committee”), composed  
26 of the California counties listed in Exhibit 1, and having claims as public entities against PG&E  
27 Corporation and Pacific Gas and Electric Company (the “Debtors”) more fully described in  
28 Exhibit 1, by and through its undersigned counsel, hereby submits this second amended verified

281015.1

1 statement ("Second Amended Verified Statement"), and in support thereof, states as follows:

2           1.       In January, 2019, the California County Counsel Association, which monitors  
3 developments in the law and new cases which affect the interests of California counties, formed  
4 the Ad Hoc Committee. On March 22, 2019, the Ad Hoc Committee engaged Lamb & Kawakami  
5 LLP ("L&K") to represent it in connection with these chapter 11 cases. Individual members of the  
6 Ad Hoc Committee joined the committee and engaged L&K on various dates due, in part, to the  
7 fact that public entities require approval of boards or other governmental bodies to retain counsel.  
8 This Second Amended Verified Statement is filed because one member, Madera County, is no  
9 longer a member of the Ad Hoc Committee.

10           2.       As of the date of this Second Amended Verified Statement, L&K represents only  
11 the Ad Hoc Committee and certain individual municipal entities. L&K does not represent or  
12 purport to represent any other entities in connection with the Debtors' chapter 11 cases and does  
13 not undertake to represent the interest of, and are not fiduciaries to any other entities other than  
14 those identified above. Each member of the Ad Hoc Committee is aware of and has consented to  
15 the L&K group representation. Members of the AD Hoc Committee do not represent or purport to  
16 represent any other entities in connection with the Debtors' chapter 11 cases, but are public  
17 entities that provide services to the public within their jurisdictions.

18           3.       The members of the Ad Hoc Committee have claims of various types arising from  
19 their relationship with the Debtors as public entities. Pursuant to Bankruptcy Rule 2019, a list of  
20 names, addresses and the disclosable economic interests of members in relation to the Debtors as  
21 of October 30, 2019, is attached as Exhibit 1. The Ad Hoc Committee members hold numerous  
22 and varied types of economic interests in relation to the Debtors including claims of the kinds  
23 more fully described in Exhibit 1.

24           4.       The information set forth in Exhibit 1, which has been reviewed and approved by  
25 the Ad Hoc Committee, is intended only to comply with Bankruptcy Rule 2019 and is not  
26 intended for any other purpose. L&K does not make any representation regarding the validity,  
27 amount, allowance, or priority of such economic interests and reserves all rights with respect  
28 thereto.

1           5.       There is no written instrument which authorizes the Ad Hoc Committee to act. The  
2 Ad Hoc Committee has acted and will continue to act with the consent of its members.

3           6.       Nothing contained in the Second Amended Verified Statement or Exhibit 1 should  
4 be construed as a limitation on, or waiver of, any rights of any member of the Ad Hoc Committee  
5 to assert, file and/or amend their claims in accordance with applicable law and any orders entered  
6 in these chapter 11 cases.

7           7.       The Ad Hoc Committee does not, by filing this Second Amended Verified  
8 Statement nor any subsequent appearance, pleading, claim or suit, submit to the jurisdiction of the  
9 Bankruptcy Court or intend that this Second Amended Verified Statement constitute a waiver of  
10 any of its rights: (i) to have final orders in core and non-core matters entered only after de novo  
11 review by a District Judge; (ii) to have any final order entered by, or other exercise of the judicial  
12 power of the United States performed by, an Article III court; (iii) to trial by jury in any  
13 proceeding so triable in these cases, or any controversy or proceeding related to these cases; (iv) to  
14 have the reference withdrawn by the District Court in any matter subject to mandatory or  
15 discretionary withdrawal; (v) to any objection to the jurisdiction of the Bankruptcy Court; or (vi)  
16 to assert any other rights, claims, actions, defenses, setoffs or recoupments to which the Ad Hoc  
17 Committee is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses,  
18 setoffs and recoupments the Ad Hoc Committee expressly reserves.

19           8.       L&K reserves the right to amend and/or supplement this Second Amended Verified  
20 Statement in accordance with the requirements of Bankruptcy Rule 2019.

21  
22 Dated: March 2, 2020

Respectfully submitted,

23 LAMB AND KAWAKAMI LLP

24  
25 By: /s/ Michael K. Slattery

26 MICHAEL K. SLATTERY

27 Attorneys for AD HOC CALIFORNIA  
28 PUBLIC ENTITIES COMMITTEE

# EXHIBIT 1

Names and Addresses of Committee Members

Member Name	Address	Disclosable Economic Interest
County of San Luis Obispo	1055 Monterey Street Ste. D320 San Luis Obispo, CA 93408	General Claims <sup>i</sup>
County of Sonoma	575 Administration Drive Room 105-A Santa Rosa, CA 95403	General Claims Wildfire Claims <sup>ii</sup>
County of Marin	3501 Civic Center Drive Ste. 275 San Rafael, CA 94903	General Claims
County of Calaveras	891 Mountain Ranch Road San Andreas, CA 95249	General Claims
County of Monterey	168 West Alisal Street, 3 <sup>rd</sup> fl. Salinas, CA 93901	General Claims
County of San Benito	Office of the County Counsel, 481 4th St. Fl. 2 Hollister, CA 95023-3840	General Claims
County of San Joaquin	44 North San Joaquin Street Sixth Floor, Suite 679 Stockton, CA 95202	General Claims
County of Tulare	2900 W. Burrel Avenue Visalia, CA 93291	General Claims
County of Fresno	2220 Tulare St, Fifth Floor Fresno, CA 93721	General Claims
County of Mariposa	5100 Bullion Street, 2nd fl. Mariposa, CA 95338	General Claims
County of Tuolumne	2 S. Green Street Sonora, CA 95370	General Claims

Member Name	Address	Disclosable Economic Interest
County of Yolo	625 Court St., Ste. 201 Woodland, CA 95695	General Claims
County of Alameda	1221 Oak Street, Suite 450 Oakland, CA 94612	General Claims
County of El Dorado	330 Fair Lane Placerville, CA 95667	General Claims
County of Stanislaus	1010 10 <sup>th</sup> St., #6400 Modesto, CA 95354	General Claims
County of El Dorado	330 Fair Lane Placerville, CA 95667	General Claims
County of Santa Cruz	701 Ocean Street, Room 505 Santa Cruz, CA 95060	General Claims

<sup>i</sup> The economic interests of members of the Committee include several types of existing and potential claims against PG&E described below. These claims vary from member to member of the Committee. The types of claims the members generally hold or may hold include (these claims are referred to as "General Claims"):

- a. Claims for real property taxes, franchise fees, and utility users' taxes collected by PG&E;
- b. Claims for damage to public property from PG&E's operations;
- c. Claims for failure to restore public property after excavation of public property to service PG&E's underground facilities;
- d. Claims for performance of obligations to move utility lines underground pursuant to Public Utilities Commission Rule 20 A;
- e. Claims arising from breach of contract between PG&E and a particular member;
- f. Claims for failure to perform obligations under state or federal law, including obligations to make monetary payments;
- g. Breach of obligations to provide electric power and natural gas to public facilities operated by the members;
- h. Claims resulting from power outages, including outages resulting from de-energization decisions made by the Debtors;
- i. Claims for reductions in the tax base of members resulting from wildfires caused by the Debtors;
- j. Claims for indemnity for any obligations paid by members as a result of any failure of performance, default or other harm caused by PG&E.

In addition to General Claims, members hold or may hold claims of the following kinds (these claims are referred to as "Wildfire Claims"):

- a. Damage to public services and infrastructure including public buildings, revenue generating public assets and services, roads, bridges, sidewalks, culverts, drains, storm and water systems (both damage to and contamination of such systems), traffic lights, stop signs, public landscaping, art, lost capacities in reservoirs, water storage and landfills;
- b. Increased costs from workers' compensation claims and overtime, and from increased use of and need for law enforcement, emergency response personnel, and other public safety services;
- c. Other damages that have or may in the future result from wildfires caused by the debtors;
- d. Claims for indemnity for any payments made by members as a result of any damage caused by wild fires.

<sup>ii</sup> See definition in Endnote i above.